

**ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE
ENVIRONMENTAL RESTORATION
REGULATORY CONTACT RECORD**

Date/Time: December 18, 2003

Site Contact(s): Marla Broussard
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Regulatory Contact: Dave Kruchek, Harlen Ainscough, Carl Spreng
Phone: 303-692-3300

Agency: CDPHE

Purpose of Contact: Consultative Process Meeting-- Meeting Notes

**December 18, 2003 Comment Resolution Meetings
For
IHSS Group SW-1 Closeout Report,
IHSS Group 700-4 ER RSOP Notification and Closeout Report,
IHSS Group 800-3 IASAP Addendum and ER RSOP Notification,
IHSS Group 900-11 IHSS 140,
IHSS Group 700-2 IASAP Addendum and Notification**

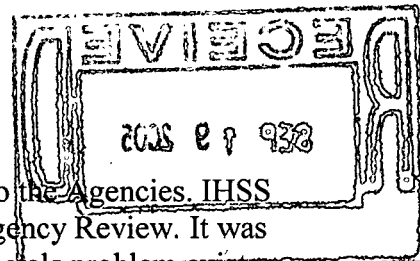
A meeting was held on December 18, 2003 to discuss several topics including, IHSS Group SW-1 Closeout Report, IHSS Group 700-4 ER RSOP Notification and Closeout Report, IHSS Group 800-3 IASAP Addendum and ER RSOP Notification, IHSS Group 900-11 IHSS 140, IHSS Group 700-2 IASAP Addendum and Notification

I. Attendees

CDPHE: Dave Kruchek, Harlen Ainscough
DOE: Norma Castaneda
K-H: Marcella Broussard
K-H Team: Susan Serreze

II. Report Status

The Annual Stewardship Summary was distributed as information to the Agencies. IHSS Group 900-11 IHSS 1602 IASAP Addendum was distributed for Agency Review. It was explained that the objective of the SAP was to evaluate whether a metals problem exists



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rather than characterize the entire IHSS. The 400-1 SAP and Notification and 400-3 Data Summary Report were issued as finals.

III. Issues

Future SAPs and Notifications can be combined into one document.

IV. Specific Comments

IHSS Group 800-3 IASAP Addendum

The following resolutions were agreed to:

1. Figure 1 will be changed to identify all IHSSs, PACs, and UBCs in IHSS Group 800-3.
2. PCB Area 15 and the storage area west of Building 883 will be added to the text, not Table 1.
3. Figure 3 was developed from maps provided to ER staff by the building decommissioning staff. Text will be added to the document to explain this.
4. Table 4 will be reviewed and the IHSS/PAC/UBC designation will be corrected if necessary.

IHSS Group 800-3 ER RSOP Notification

The following resolutions were agreed to:

1. PCB Area 15 and the storage area west of Building 883 will be added to the text, not Table 1.
2. Figure 1 will be changed to identify all IHSSs, PACs, and UBCs in IHSS Group 800-3.
3. The storage area will be outlined. Features that are identified on the key, such as roads, will not be identified again on the maps.
4. Section 2.2 will be changed to include process waste lines.
5. The reference to the Facility Disposition RSOP will not be included at this time. The document is under revision and ER will wait to confirm changes prior to adding a reference.
6. Text will be added that explains that IHSS 000-162 is part of IHSS Group 000-2.
7. Section 2.52. will be reviewed and revised, if necessary.
8. Text will be added as suggested in Section 2.53.
9. The text will be changed to state that no soil treatment is anticipated.
10. The text will be changed as suggested in Section 2.9 by the State.

IHSS 140 NFAA

The following resolutions were agreed to:

1. Sampling at IHSS 140 will be deferred until after 903 Lip Area work. If the 903 Lip Area work identifies the burn area, it will be remediated as part of that project and no further investigation will be required.
2. If sampling is required, a statistical grid will be used to determine sampling locations. A tighter statistical grid will be used in the area of the "pit" seen on aerial photographs. Sampling will be required from 0.5 to 2.5 feet and perhaps to 4.5 feet in the south and west portion of the IHSS originating outside of the existing IHSS boundary
3. Samples will be sent to an offsite laboratory for method 6010.

SW-1 Closeout Report

The following resolutions were agreed to:

1. Remove downgradient well paragraph regarding new (dry) wells.
2. It is agreed the Site is a NFAA and the EPA will send an approval letter.

700-4 Notification and Closeout Report

It was agreed the Site would send the report for verification that comments other than the non-rad SOR issue had been addressed. Once the non-rad SOR issue was resolved, the report would be finalized and sent for approval.

700-2 IASAP Addendum

The following resolutions were agreed to:

1. The text has been corrected to refer to Tank 30 and not Tank 12.
2. Analysis for PCBs has been added to sample locations CG42-003, CG43-019, and CG43-022 near the former PCB release area.
3. Text has been added to the section stating that outside contamination may be related to activities performed inside the building and that a soil remediation was conducted to remove PCBs contaminated soil from an area on the east side of Building 707.
4. Text has been added to clarify the sampling rationale at the roof drain outfalls. A field check of the transformer area on the roof of Building 707 confirmed that the

area is surrounded by a concrete berm and that runoff from this area is conveyed to a single drain that corresponds with Location CG43-019; therefore, additional PCBs analysis is not warranted at other roof drain outfalls.

5. Analytical data from the PCB investigation were evaluated and no PCBs were detected at levels exceeding the cleanup criteria of 25 ppm. Biased sample Locations CG43-19 and CG42-003 have been relocated to approximately 5 feet west to determine if PCBs contamination extends under the building slab.
6. The figure has been changed to show the module numbers inside the building.
7. Field conditions are evaluated during sampling to determine if additional bias sample locations are warranted.
8. The sample locations inadvertently omitted from the table have been added.
9. Text has been added as a footnote to the sampling specifications table to clarify where the first interval will be obtained based on soil conditions.
10. Sample CF42-001 has been eliminated as suggested.
11. Sample CF42-002 has been relocated as suggested; however, the proposed sample depth should be sufficient, as the OPWL in this area of the building is shallow.
12. Engineering drawings indicate that OPWL at these locations is shallow; therefore, the proposed sampling intervals should be sufficient.
13. Sample CF43-007 has been eliminated as suggested.
14. Engineering drawings indicate a depressed floor slab where statistical sample CG42-000 is located; therefore, the sample should remain in its present location.
15. Assuming the reference is to sample CG42-002, the sample will be moved northward as suggested. OPWL is shallow in this area of the building; therefore, the proposed sample intervals should be sufficient.
16. The samples have been moved approximately 5-feet west to sample soil beneath the Building 707 slab and will also be analyzed for PCBs as suggested.
17. The sample locations were inadvertently omitted from the figure. The sampling locations have been added.

The document will be revised and issued as final upon receipt of the State approval letter.

IV. Meetings

The next meeting will be held January 8, 2004 at 10:30 at the Mountain View offices' Breckenridge room.